

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :  
: Plaintiff, :  
v. : : Criminal Action No. 05-15-SLR  
: JOSEPH PRYER, :  
: Defendant. :  
:

**MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS**

Defendant, Joseph Pryer, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court pursuant to Federal Rule of Criminal Procedure 45(b) and Local Rule 5(a) for an order enlarging the time within which pretrial motions may be filed. In support of this motion the Defendant submits as follows:

1. Pre-trial motions for this case are due by May 5, 2005.
2. Discovery for this case was not received by defense counsel until April 26, 2005.
3. Defense counsel requires additional time to review the discovery and to speak with Mr. Pryer to discuss how the defense is going to proceed. Defense counsel is not able to determine which pre-trial motions, if any, need to be filed until she has the adequate opportunity to review the discovery and to speak with Mr. Pryer regarding this case.
4. Keith Rosen, Esquire, the attorney handling the case for the government, does not object to the enlargement of time.
5. The parties have agreed that any additional time given in which to file pre-trial motions will be excludable under the Speedy Trial Act.

WHEREFORE, it is respectfully requested that the time for Defendant to file pre-trial motions be extended to any time after May 26, 2005.

Respectfully Submitted,

/s/ Eleni Kousoulis  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
First Federal Plaza  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Joseph Pryer

Dated: May 4, 2005

**CERTIFICATE OF SERVICE**

Undersigned counsel certifies that a copy of Defendant's Motion to Extend Time to File Pretrial Motions is available for public viewing and downloading and was electronically delivered on May 4, 2005, to:

Keith Rosen, Esquire  
Assistant U.S. Attorney  
1007 Orange Street  
Suite 700, P.O. Box 2046  
Wilmington, DE 19899-2046

/s/ Eleni Kousoulis  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
704 King Street Suite 110  
Wilmington, DE 19801  
(302) 573-6010

DATED: May 4, 2005